

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

BARTON CICERO, individually and on behalf of all others similarly situated,	C.A. No. 25-cv-0369-GBW
Plaintiff,	
v.	
SEGWAY, INC., a Delaware Corporation	
Defendant.	

AARON JOHN SABU and CHRISTOPHER HOLMES, individually and on behalf of all others similarly situated,	C.A. No. 25-cv-0394-GBW
Plaintiffs,	
v.	
SEGWAY, INC., a Delaware Corporation	
Defendant.	

MARY RZEWUSKI and EDWARD STEVEN HEYMER, individually and on behalf of all others similarly situated,	C.A. No. 25-cv-0463-GBW
Plaintiffs,	
v.	
SEGWAY, INC., a Delaware Corporation	
Defendant.	

**DECLARATION OF EDWARD HEYMER**

Pursuant to 28 U.S.C. § 1746, I, Edward Heymer, declare and state as follows:

1. I am a Plaintiff in this consolidated action.
2. I have personal knowledge of the matters set forth herein and submit this declaration in response to Defendant's Motion to Compel Arbitration.
3. I am an adult individual residing in Murrieta, California, where I intend to stay.
4. I purchased a Segway Ninebot Max G30P from a Best Buy on approximately August 7, 2022.
5. I did not purchase this product directly from Segway, Inc.
6. Upon receipt of the Product, I received it in its original packaging.
7. I did not see any sticker or other indication on the original packaging of the Product, prior to my opening it, that contained a reference to any arbitration clause.
8. Upon opening the original packaging, I did not see any warranty booklet inside the original packaging pertaining to the Product that I had knowledge of its containing any arbitration clause.
9. I have never seen any arbitration provision as it relates to this Product on Defendant's website or otherwise.
10. I have not now or ever agreed to arbitration with Defendant as it relates to this Product.

I declare under the penalty of perjury that the foregoing is true and correct.

Dated: 6/17/2025

DocuSigned by:  
  
Edward Heymer  
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